

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

**In the Matter of the Petition**

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**of**

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**GRACE OCEAN PRIVATE LIMITED, as  
Owner of the M/V DALI,**

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**Case No.: 1: 24 - CV - 00941 JKB**

**And**

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**SYNERGY MARINE PTE LTD, as Manager  
of the M/V DALI,**

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**for Exoneration from or Limitation of  
Liability**

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**MOTION FOR ADMISSION PRO HAC VICE**

I, **TERRY L. GODDARD**, am a member in good standing of the bar of this Court. I am moving the admission of **FREDERICK W. SWAIM, III** to appear pro hac vice in this case as counsel for **ALTS USA, LLC, Atlantic Specialty Insurance Company, JLJ International Holdings, LLC and Skyline International Corporation**

We certify that:

1. The proposed admittee is not a member of the Maryland bar and does not maintain any law office in Maryland.
2. The proposed admittee is a member in good standing of the bars of the following State Courts and/or United States Courts:

State Court & Date of Admission

U.S. Court & Date of Admission

**State of Louisiana, 10/18/2002**

**USDC-Eastern District of Louisiana, 9/24/2003  
USDC-Middle District of Louisiana, 1/24/2007  
USDC-Western District of Louisiana, 1/24/2007  
5<sup>th</sup> Circuit Court of Appeals, 3/3/2008**

3. During the twelve months immediately preceding this motion, the proposed admittee has been admitted pro hac vice in this Court **zero (0)** time(s).

4. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction. (NOTE: If the proposed admittee has been disbarred, suspended, or denied admission to practice law in any jurisdiction, then he/she must submit a statement fully explaining all relevant facts.)

5. The proposed admittee is familiar with the Maryland Attorneys' Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court, and understands he/she shall be subject to the disciplinary jurisdiction of this Court.

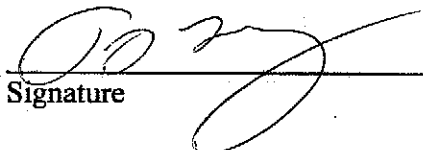
6. The proposed admittee understands admission pro hac vice is for this case only and does not constitute formal admission to the bar of this Court.

7. Either the undersigned movant or James D. Skeen, is also a member of the bar of this Court in good standing, and will serve as co-counsel in these proceedings.

8. **The \$100.00 fee for admission pro hac vice accompanies this motion.**

9. We hereby certify under penalties of perjury that the foregoing statements are true and correct.

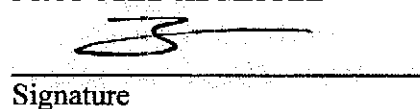
*MOVANT*

  
Signature

**Terry L. Goddard Jr., MD #15460  
Skeen & Kauffman, LLP**

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*PROPOSED ADMITTEE*

  
Signature

**Frederick W. Swaim, III, LA 28242  
Galloway Johnson Tompkins Burr  
& Smith, APLC**

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